



a science group company

**Technology Sciences Group Inc.**

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October 4, 2021

Via CDX

Eric Miederhoff/Aidan Fife  
U.S. Environmental Protection Agency  
One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202

RE: Submission of Revised Certificates of Analysis in Response to EPA Data Deficiency Letter  
Product Name: Behr Sanitizing Paint  
EPA File Symbol 32273-RN  
Action Case Number: 00299430

Dear Eric and Aidan:

On behalf of Behr Process Corporation (Behr), enclosed please find revised Certificates of Analysis in response to the Agency's letter dated July 20, 2021. This submission provides additional information to the response contained in the August 25, 2021 submission responsive to the Technical Screen.

The following volume contains is enclosed with this submission:

MRID 51704301: Behr Sanitizing Paint: Certificates of Analysis in Support of Efficacy Data: SUPPLEMENTARY INFORMATION TO SUPPORT MRIDS 51549609, 51549610, 51549611, and 51549612.

Each of the efficacy studies was run on 10 different formulas; each of the 10 formulas consisted of two different lots, each named Lot 1 and Lot 2. The following formulas and lots were tested:

1. Eggshell Base Paint **WITH** active ingredient – Lots 1 and 2; Behr's primary test formula to which pigments were added as identified below in Items 2 - 4.
2. Eggshell Base Paint **WITH** active ingredient with carbon black pigment – Lots 1 and 2
3. Eggshell Base Paint **WITH** active ingredient with organic pigment – Lots 1 and 2
4. Eggshell Base Paint **WITH** active ingredient with inorganic pigment – Lots 1 and 2

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5. Eggshell Base Paint **WITHOUT** active ingredient – Lots 1 and 2; control formula to which pigments were added as identified below in Items 6 - 8.
6. Eggshell Base Paint **WITHOUT** active ingredient with carbon black pigment – Lots 1 and 2
7. Eggshell Base Paint **WITHOUT** active ingredient with organic pigment – Lots 1 and 2
8. Eggshell Base Paint **WITHOUT** active ingredient with inorganic pigment – Lots 1 and 2
9. Semi-Gloss Deep Paint **WITH** active ingredient – Lots 1 and 2
10. Semi-Gloss Deep Paint **WITHOUT** active ingredient – Lots 1 and 2

It is our intention that the revised CoAs more clearly identify this information.

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Please contact me at 202-828-8987 or by email at [juli.mann@tsgconsulting.com](mailto:juli.mann@tsgconsulting.com) if you have any questions or need any additional information. Thank you.

Best regards,



Juli Mann  
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